

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

REPUBLICAN NATIONAL COMMITTEE;
REPUBLICAN PARTY OF THE VIRGIN
ISLANDS

Plaintiffs,

vs.

VIRGIN ISLANDS BOARD OF ELECTION;
CAROLINE F. FAWKES, in her official
capacity as SUPERVISOR OF ELECTIONS
SYSTEM, VIRGIN ISLANDS,

Defendants.

Case No. 3:22-cv-00049-RAM-RM

JOINT MOTION TO EXTEND TIME TO COMPLETE DISCOVERY

Plaintiffs and Defendants jointly request for the Court's leave to complete currently outstanding discovery past March 31, 2023. In support of this motion, the parties state as follows:

1. Under this Court's scheduling order, fact discovery closes on March 31, 2023. *See* Doc. 43, at 1.
2. On February 24, 2023, Plaintiffs served a set of requests for admissions, requests for production, and interrogatories. Defendants' responses are currently due on March 27, 2023.
3. Plaintiffs' counsel also advised Defendants' counsel that Plaintiffs would notice three depositions before the close of fact discovery. And on March 15, 2023, Plaintiffs formally noticed those depositions.
4. Consistent with the representations made during the status conference on February 7, 2023, Defendants seek an additional 30 days to prepare their responses and production. Because Defendants' responses and production would be due on April 26, 2023, the parties seek this Court's permission to complete discovery past the current March 31 discovery deadline.

5. Given this request for an extension, the parties also request permission for Plaintiffs to conduct depositions within a reasonable time after reviewing Defendants' discovery responses and production.

6. This modest extension of discovery deadlines will not unduly prejudice any party because both parties consent to such relief and jointly file this motion. Critically, this extension will not delay any further proceedings before the Court. Under the scheduling order, Plaintiffs' dispositive motion is not due until June 30, 2023. Plaintiffs will have an ample amount of time to prepare a dispositive motion even if the depositions take place in May.

7. For the foregoing reasons, and other good cause found, the parties jointly request that the Court allow Defendants to respond to Plaintiffs' discovery requests by April 26, 2023, and allow Plaintiffs to conduct the depositions within a reasonable time after April 26, 2023.

Dated: March 16, 2023

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Respectfully submitted,

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Dated: March 16, 2023

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